

KATHLEEN BLISS, ESQ.
Nevada Bar No. 7606
JACQUELINE TIRINNANZI, ESQ.
Nevada Bar No. 13266
KATHLEEN BLISS LAW PLLC
1070 West Horizon Ridge Pkwy., Suite 202
Henderson, Nevada 89012
Telephone: 702.463.9074

Attorneys for Harold David Sobel

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

HAROLD DAVID SOBEL,

Defendant.

CASE NO.: 2:21-cr-00235-APG-EJY

**STIPULATION TO EXTEND TIME TO
REPLY REGARDING DEFENDANT'S
MOTION FOR RELEASE AND
PROPOSED ORDER
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason Frierson, United States Attorney for the District of Nevada, and Mina Chang, Assistant United States Attorney, and Gustav W. Eyler, Director, and Meredith B. Healy and Wei Xiang, Trial Attorneys, U.S. Department of Justice, Consumer Protection Branch, counsel for the United States of America, and Jacqueline Tirinnanzi and Kathleen Bliss, counsel for Harold David Sobel, that the parties request this Court to extend the deadline to reply to Defendant's Motion for Release Pending Sentencing and Supplement (ECF No. 55, 58), in order to provide the parties the opportunity to address non-party CoreCivic Inc.'s forthcoming response to Defendant's Motion. This stipulation is made and based upon the following:

On July 22, 2022, Mr. Sobel filed a Motion for Release Pending Sentencing¹ (ECF No. 55) and on July 29, 2022, filed a Supplement to said Motion (ECF. No 58). The general basis of the Motion concerned Mr. Sobel's medical care at Nevada Southern Detention Center ("NSDC"), a CoreCivic, Inc. facility, where he is currently detained.

The government filed their response to Mr. Sobel's motion on August 5, 2022. ECF No.

¹ Mr. Sobel entered his change of plea on July 14, 2022. ECF No. 53.

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61. The same day, representation for Core Civic, Inc., filed a Notice Regarding Defendant's Motion for Release Pending Sentencing and Supplement to Motion for Release Pending Sentencing.² ECF No. 64. Shortly thereafter on August 8, 2022, this Court entered an order requesting non-party CoreCivic, Inc., to file a response as to Mr. Sobel's medical care by August 22, 2022. ECF No. 65.

In light of the now approaching response by CoreCivic, Inc., as to Mr. Sobel's medical care at NSDC, the parties stipulate that Mr. Sobel will file his reply to the government's response and CoreCivic Inc.'s response within three days of the filing of CoreCivic, Inc's response. Furthermore, the parties stipulate that the government may file a reply only as it relates to CoreCivic Inc.'s response, also within three days of CoreCivic Inc.'s response filing. The parties stipulate to this shortened reply deadline so as to prevent delay. Denial of this request would deny counsel for Mr. Sobel the opportunity to prepare a complete reply given the additionally awaited response of CoreCivic, Inc. as it relates to this original Motion and supplement. This stipulation requested is mindful of the exercise of due diligence, in the interests of justice and not for any purposes of delay.

Dated this 12th day of August, 2022.

JASON FRIERSON
United States Attorney

By /s/ Mina Chang
MINA CHANG
Assistant United States Attorney

² CoreCivic, Inc.'s notice to the Court and parties stated that CoreCivic, Inc. takes no position on Defendant Sobel's request for release as sought in his Motion for Release Pending Sentencing (ECF No. 55) and Supplement to the Motion (ECF No. 58). CoreCivic, Inc, however denies Defendant Sobel's allegations of improper medical care at its NSDC and would provide a response to those allegations if it would assist the Court in ruling on the Motion. *See* ECF No. 64.

1 GUSTAV W. EYLER
2 Director
3 U.S. Department of Justice

4 By /s/ Meredith Burns Healy
5 MEREDITH BURNS HEALY
6 Trial Attorney

7 By /s/ Wei Xiang
8 WEI XIANG
9 Trial Attorney

10 /s/ Jacqueline Tirinnanzi
11 JACQUELINE TIRINNANZI, ESQ.
12 Counsel for Harold David Sobel

13 **IT IS SO ORDERED.**

14 
15 **THE HONORABLE ANDREW P. GORDON**
16 **UNITED STATES DISTRICT JUDGE**

17 **DATED:** August 15, 2022
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